REMARKS/ARGUMENTS

Claims 1-9, 14, 17-21, 35-43, 46-52, 56, and 61-72 are currently pending in this application. Claims 1 and 35 have been amended. Applicant submits that the amendments to the claims are for clarity purposes and for reasons unrelated to patentability of these claims. The amendments find full support in the original specification, claims, and drawings. No new matter has been added. In view of the above amendments and remarks that follow, reconsideration and an early indication of allowance of claims 1-9, 14, 17-21, 35-43, 46-52, 56, and 61-72 are respectfully requested.

As an initial matter, Applicant submits herewith an Information Disclosure Statement (IDS) with the IBM references that were not submitted in the IDS filed on January 11, 2002, and March 13, 2004. All the other references crossed out by the Examiner were submitted in the IDS filed on July 31, 2006.

Claims 1-7, 17-21, 35-41, 50-52, 56, and 63-70 are rejected under 35 U.S.C. 103(a) as being unpatentable over Srinivasan et al. (U.S. Patent No. 6,357,042) in view of Wistendahl et al. (U.S. Patent No. 6,496,981). Claim 9 is rejected under 35 U.S.C 103(a) as being unpatentable over Srinivasan et al. in view of Wistendahl and further in view of Shoff et al. (U.S. Patent No. 6,240,555). Claim 42 is rejected under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Wistendahl and further in view of Oguro et al. (U.S. Pub. No. 2001/0033739). Claims 61, 62, and 72 are rejected under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Wistendahl and further in view of Kaiser et al. (U.S. Patent No. 6,615,408). Applicant respectuflly traverses these rejections.

The Examiner relies on Srinivasan's disclosure of coordinate-tracking data that is associated with an image entity or entities to contend that this is the claimed "mask including location and graphics data of two or more graphics images to be overlaid on the two or more video objects." (See, Office action, p. 6, par. 2). The Examiner acknowledges, however, that Srinivasan fails to disclose a mask "including an identifier to an object mapping table." The Examiner also acknowledges that Srinivasan does not teach the claimed "object mapping table."

However the Examiner continues to argue that Wistendahl's N-data is the claimed "object mapping table," and that Wistendahl discloses a "mask further including an identifier to an object mapping table." (See, Office action, p. 8, par. 2). Applicant respectfully disagrees.

Assuming, *arguendo*, that Wistendahl's N data is the claimed "object mapping table," Examiner's argument seems to assume Wistendahl includes separate "mask" data with an "identifier" to such N data. However, no such separate "mask" data is taught nor suggested in Wistendahl. Instead, once a user of Wistendahl's system selects a particular image, an IDM program is invoked to compare the selected coordinates with the hotspot coordinates stored as N data to determine whether the selected image is indeed a hotspot. (See, Col. 9, lines 13-27). If the Examiner is equating the hotspot coordinates as the claimed "identifier," and assumes that this "identifier" is stored in a "mask," such logic fails because the hotspot coordinates are stored as N data which the Examiner equates to the claimed "object mapping table," and not the claimed "mask."

Assuming, *arguendo*, that Wistendahl's N data is the claimed "object mapping table," a combination of Srinivasan and Wistendahl to reach Applicant's invention would require Srinivasan's coordinate-tracking data, which the Examiner relies on to contend is the claimed "mask," to be modified to "further includ[e] an identifier to an object mapping table." That is, Srinivasan's coordinate-tracking data would have to be modified to include an identifier to Wistendahl's N-data. However, Applicant submits that a person of skill in the art would have no reason to modify Srinivasan's coordinate-tracking data in this manner. As discussed, Wistendahl's N-data simply defines the display location coordinates of designated "hot spot" areas and thus, is akin to coordinate tracking data that is output by Srinivasan's tracking module. (See, Srinivasan, Col. 5, lines 53-61; Col. 7, lines 32-35; Wistendahl Col. 6, lines 41-45). As with Srinivasan's coordinate tracking data that provides the coordinates of an assumed center point of a tracked image entity on a frame-by-frame basis (see, Srinivasan Col. 7, lines 24-35), Wistendahl's N data provides the coordinates of each hot spot area on a frame-by-frame basis. (See, Wistendahl, Col 6, lines 41-45). Srinivasan's coordinate-tracking data can do everything that Wistendahl's N data would do, if not more. Thus, a person of skill in the art, would have no

reason to have Srinivasan's coordinate-tracking data identify via an "identifier," Wistendahl's N data. In fact, given Srinivasan's coordinate-tracking capabilities, there is no reason for a person of skill in the art to even turn to Wistendahl's teachings of N data. The Examiner contends that the reason is to "use media content for interactive television . . . as disclosed by Wistendahl." However, such use of media content is available in Srinivasan's system even without Wistendahl's teachings. (See, Srinivasan, Col. 6, lines 8-18).

Applicant also respectfully submits that Wistendahl's N data cannot in fact be the claimed "object mapping table." Wistendahl's N data does not include "an indicia included in the corresponding mask identifying a particular video object," and "an identifier to a corresponding one of a plurality of information data structures included in one or more of the plurality of object data packets," as is now required in amended claim 1. (Emphasis added). Any indicia in Wistendahl's N data that identifies object A or object B is not "an indicia included in the corresponding mask." (Emphasis added). Furthermore, even if the N data itself may constitute a data structure as defined in the Computer Dictionary referenced by the Examiner, the N data does not in turn include "an identifier to a corresponding one of a plurality of information data structures" as is required by claim 1. It is not clear from the Examiner rejection what would constitute such a claimed "identifier" in the N data, especially since the N data simply stores display location coordinates. Accordingly, claim 1 is in condition for allowance.

Independent claims 35, 63, and 67 include limitations that are similar to the limitations of claim 1 which makes claim 1 allowable. Accordingly, claims 35, 63, and 67 are in condition for allowance.

Claims 2-9, 14, 17-21, 36-43, 46-52, 56, 61-62, 64-66, and 68-70 are also in condition for allowance because they depend on an allowable base claim, and for the additional limitations that they contain.

Specifically with respect to claims 56, 66, and 70, these claims specifically recite how the "object mapping table" is identified from the claimed "mask," and how information stored in the "object mapping table" is used to display information on a display device. The Examiner contends that Wistendahl discloses all of the limitations of claims 56, 66, and 70. However,

given that Wistendahl fails to disclose the claimed "object mapping table," Wistendahl cannot disclose all of the limitations of claims 56, 66, and 70. Accordingly, claims 56, 66, and 70 are also in condition for allowance for the added limitations recited therein.

With respect to claim 72, the Examiner acknowledges that Srinivasan and Wistendahl do not display the claimed "visibility bit." However, the Examiner relies on Kaiser to make up for this deficiency. Specifically, the Examiner contends that because Kaiser highlights images referencing a product, this constitutes the claimed "visibility bit." Applicant respectfully disagrees. The highlighting itself visually identifies an object in Kaiser. Nothing in Kaiser indicates, however, that the highlighting is based on a "visibility bit" which will determine whether the highlighting is in fact to occur. Accordingly, claim 72 is also in condition for allowance for the added limitations recited therein.

Claim 71 is rejected under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Wistendahl and further in view of Reimer et al. (U.S. Patent No. 5,553,221). Claim 71 is in condition for allowance because it depends on an allowable base claim, and for the additional limitations that it contains. Specifically, claim 71 recites an "object properties table" which the Examiner acknowledges is not disclosed in Srinivasan nor Wistendahl. However, the Examiner relies on the movie source information disclosed in Reimer to contend that it would have been obvious to modify the combination of Srinivasan and Wistendahl to include Reimer's movie source information. However, Reimer's source information is not the claimed "object properties table" because, among other things, it is not part of the "annotation data" that is transmitted to a receiver as "augmented video information" along with "video information." Instead, in Reimer, the movie source information is stored in a foundation information database 112. (Col. 6, lines 56-64). The indicies to the foundation information database 112 are stored in an index information database 122. (Col. 7, lines 20-30). A user transmits requests information related to a movie to a presentation and control component 104 which processes the requests by accessing the index information in the index information database 122 to identify and locate the particular foundation information indicated by the user requests. (Col. 7, lines 51-57). The presentation and control component then retrieves the foundation information from the foundation
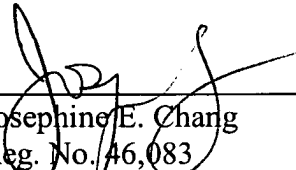
information database 112 and presents this foundation information to the users via the user devices. Accordingly, claim 71 is also in condition for allowance for its added limitations.

Claim 1 is also rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claim 1 of U.S. Patent No. 7,249,367. Applicant will submit a Terminal Disclaimer for the purpose of shortening the term of the patent that issues on the present application so that the patent does not extend beyond the expiration date of U.S. Patent No. 7,249,367, once Applicant receives an indication of allowance of the present application.

In view of the above amendments and remarks, reconsideration and an early indication of allowance of the now-pending claims 1-9, 14, 17-21, 35-43, 46-52, 56, and 61-72 are respectfully requested.

Respectfully submitted,

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